

REMARKS

Claims 1 – 24 are pending. Claims 1 – 17 are rejected. Claims 18 – 24 are withdrawn.

The applicant's attorney cancels claim 1 and amends claims 2 – 7, 10, 11 and 13. Claim 7 is amended to convert it into an independent claim by including the limitations of claim 1 from which it depends. The amendment to claim 7 does not narrow claim 7 and does not add new matter. Claims 2 – 6, 10 and 11 are amended, not to overcome the examiner's rejection, but to change their dependency from claim 1, now canceled, to claim 7. The applicant's attorney respectfully asserts that claims 1 – 17, as amended, are patentable over U.S. Patents 5,863,452 issued to Harshberger, Jr. et al. (Harshberger) and 4,576,776 issued to Anderson (Anderson) for the reasons discussed below.

If, after considering this response, the examiner believes the claims should not be allowed, the applicants' attorney respectfully requests that before issuing an Office Action, the examiner call Mr. John Janeway (425-455- 5575) to schedule a telephone conference to further the prosecution of the claims.

Rejection of claims 2 – 12

The applicant's attorney respectfully disagrees with the examiner's rejection of claim 7 for two reasons. First, Harshberger and Anderson each fail to disclose an interface that releasably couples a heating element with a power source. Second, the examiner has failed to show that Harshberger, Anderson or the knowledge generally available to one skilled in the art includes a motivation or suggestion to modify Harshberger with Anderson to provide Harshberger's pressure vessel an interface that releasably couples the Harshberger's heating element with a power source.

To establish a *prima facie* case of obviousness, three basic elements are required. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a

reasonable expectation of success. And third, the references when combined must teach or suggest all the claim limitations. MPEP; 8th edition; §2143.

**Harshberger And Anderson Each Fail To Disclose An Interface That Releasably
Couples A Heating Element With A Power Source**

The applicant's claim 7, as amended, recites a pressure vessel having a portal that includes an interface to releasably couple a heating element located inside the vessel with a power source located outside the vessel.

For example, as shown in FIGS. 1 – 3 and discussed in paragraphs 15, 16, 22, 24, 26 and 27 of the specification, a system 10 for curing, in the field, a repair 12 to a component 14 made of composite materials includes a pressure vessel 18, a heating element 20, and a power source 22 for powering the heating element 20. The vessel 18 includes a portal 28 having an interface 44 for releasably coupling the heating element 20 to the power source 22. The interface 44 includes a coupler 50 to which both the heating element 20 and the power source are releasably connected. With the coupler 50, one can easily change heating elements as required to heat different sized and shaped components or component repairs. Also, one can easily change power sources as required to use the system 10 at different locations in the field.

In contrast and by the examiner's admission, Harshberger fails to disclose an interface that releasably couples a heating element with a power source.

Also in contrast, Anderson fails to disclose an interface that releasably couples a heating element with a power source. Anderson discloses an apparatus 2 (FIG. 1) for curing composite materials. The apparatus 2 includes a body 4, a heating element 44 inside the body, a motor 20 (FIG. 1) to rotate the body 4 about the body's longitudinal axis (not shown but see FIG. 6) while the element 44 heats a composite, and two rails 10 (FIGS. 1 and 6) to hold the body 4 as it rotates about its longitudinal axis. The body 4 includes an end wall 6 having an electrical connector 46 (FIG. 1) and an electrical line 47 that is connected to the connector 46 and that supplies power to the heating element 44. Anderson does not state that the line 47 is releasably connected to the connector 46. Anderson also does not state that the apparatus 2 is designed to be moved among

different locations or used with different power sources. Furthermore, because the motor 20 rotates the body 4 while the heating element heats a composite in the body 4, it is unlikely that the line 47 is releasably coupled to the connector 46 to avoid the line 47 inadvertently separating from the connector 46 as the body 4 rotates. Thus, it is not clear that the line 47 is releasably coupled to the connector 46. Therefore, unlike the applicant's pressure vessel, Anderson's body 4 does not include an interface that releasably couples the heating element 44 with the power source.

Examiner Fails to Show a Motivation or Suggestion to Modify Harshberger

The examiner has failed to show that Harshberger, Anderson or the knowledge generally available to one skilled in the art includes a motivation or suggestion to modify Harshberger with Anderson to provide Harshberger's pressure vessel an interface that releasably couples Harshberger's heating element with a power source.

A motivation or suggestion to modify Harshberger does not exist in Harshberger or Anderson. As discussed above, Harshberger and Anderson do not disclose an interface that releasably couples a heating element with a power source. Furthermore, Harshberger and Anderson do not disclose curing vessels meant to be transported to and used at different locations in the field. Therefore, Harshberger and Anderson do not suggest or motivate one to modify Harshberger's pressure vessel to provide the vessel an interface that releasably couples Harshberger's heating element with a power source.

The examiner has not shown that the knowledge generally available to one of ordinary skill in the art includes a motivation or suggestion to provide a pressure vessel to cure composite materials, with an interface that releasably couples a heating element with a power source to allow one to easily use the pressure vessel at different locations in the field and with different power sources. Thus, the applicant's attorney asserts that the examiner uses hindsight — knowledge obtained from reading the applicant's patent application — when concluding that the motivation of allowing the heating element to be

disconnected from the power source exists in the knowledge generally available to one skilled in the art. Such use of hindsight is impermissible to support *prima facie* case of obviousness.

Therefore, the examiner has failed to show in the knowledge generally available to one skilled in the art that a motivation or suggestion to modify Harshberger with Anderson to make an interface that releasably couples a heating element with a power source exists.

Claims 2 – 6 and 8 – 12 are patentable by virtue of their dependencies from claim 7.

Rejection of Claims 13 – 17

Claim 13 is patentable over Harshberger and Anderson for reasons similar to those recited above in support of claim 7 over Harshberger and Anderson.

Claims 14 – 17 are patentable by virtue of their dependencies from claim 13.

Conclusion

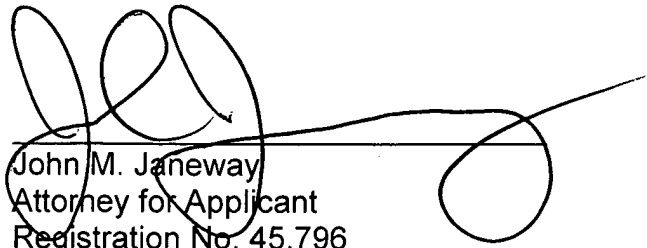
The applicant's attorney respectfully requests the examiner withdraw the rejection of claims 1 – 17 and issue an allowance for these claims.

Should any additional fees be required, please charge them to Deposit Account No. 07-1897.

If, after considering this response, the examiner believes the claims should not be allowed, the applicants' attorney respectfully requests that before issuing an Office Action, the examiner call Mr. John Janeway (425-455- 5575) to schedule a telephone conference to further the prosecution of the claims.

DATED this 22nd day of March 2006.

Respectfully submitted,
GRAYBEAL JACKSON HALEY LLP



John M. Janeway
Attorney for Applicant
Registration No. 45,796
155-108th Avenue N.E., Ste. 350
Bellevue, WA 98004-5973
(425) 455-5575